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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION

12 IN RE: HIGH-TECH EMPLOYEE  
13 ANTITRUST LITIGATION

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

Case No. 3:11-cv-2509-LHK

**DECLARATION OF THOMAS M. JEON  
ON BEHALF OF LUCASFILM LTD.  
PURSUANT TO COURT'S APRIL 15, 2013  
ORDER (DKT. 402)**

Courtroom: 8, 4<sup>th</sup> Floor  
Judge: Hon. Lucy H. Koh

Date Consol. Amended Compl. Filed:  
September 13, 2011

Trial Date: November 12, 2013

1 I, THOMAS M. JEON, state and declare as follows:

2 1. I am an attorney admitted to practice in the State of California and am in-house  
3 counsel in the Business Affairs department at Lucasfilm Ltd. I have personal knowledge of the  
4 facts stated in this declaration and, if called upon to do so, could and would competently testify  
5 under oath thereto.

6 2. I submit this declaration in response to the Court's April 15, 2013 Order directing  
7 in-house counsel for each Defendant in this case to file a sworn declaration confirming the  
8 production of all compensation materials responsive to Plaintiffs' Requests for Production of  
9 Documents. (Dkt. 402)

10 3. I have been the Lucasfilm in-house attorney with primary responsibility for  
11 overseeing Lucasfilm's document collection in this case, including the collection of documents  
12 related to Lucasfilm's compensation of employees. In that capacity, I have worked with  
13 Lucasfilm's employees, outside counsel, and vendors to search for, collect, and produce  
14 Lucasfilm documents responsive to Plaintiffs' Requests for Production.

15 4. Lucasfilm has made a diligent search for all non-privileged documents concerning  
16 compensation of Lucasfilm employees for each year in the discovery period in this case that are  
17 maintained in the ordinary course of its business and are responsive to Plaintiffs' Requests for  
18 Production of Documents, as the scope of those Requests have been defined by agreement of the  
19 parties. Lucasfilm collected and produced all documents located pursuant to this search.

20 5. Lucasfilm's search, collection, and production efforts included the following  
21 categories and sources of materials:

22 i) Electronically-stored information of 29 individual custodians, pursuant to  
23 search terms agreed to by the parties, and including Plaintiffs' requests for additional custodians  
24 and additional search terms after an initial search was conducted;

25 ii) Collection of responsive policy or high-level summary documents that  
26 were identified by knowledgeable Lucasfilm personnel;

27 iii) Searches of paper and electronic repositories identified by knowledgeable  
28 Lucasfilm personnel;

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed in San Francisco, California, on April 24, 2013.

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DECLARATION OF THOMAS M. JEON  
Case No. 3:11-cv-2509-LHK